

Reject Disposal Injection Well Permit PAS2D702BALL

Non-responsive based on revised scope.

Mon 8/29/2022 8:40 PM

To: R3 UIC Mailbo R3 UIC Mailbo @epa.gov

Hello,

I am asking that the EPA deny the permit for the proposed injection well (Penneco Sedat 4A) in Plum Boro. In short, fracking is an environmentally toxic method for resource extraction that is incompatible with our ability to move toward a sustainable future and protect the health of the residents in Allegheny County. My mother and sister's family with two young children live in Plum Boro and my wife and I live in Edgewood. Like hundreds of thousands of other residents, our drinking water source is the Allegheny river and this well would increase our collective exposure to toxic and cancer causing chemicals already abundant in the region. Scientific studies also continue to be published that expose that these types of facilities also spread the PFAS/PFOS forever chemicals that cannot be contained. The Pittsburgh region is already home to a unique hodgepodge of industrial pollution that routinely degrades our physical wellbeing, lifespan, and mental health. On behalf of my family, I implore you, please deny the expansion of this archaic and poisonous fracking well which only serves to harm the residents and our local environment.

Sincerely,

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For more justification, please see the below:

The applicant, Penneco Environmental Solutions, LLC, has several violations and an unresolved permit application at immediately adjacent injection wells, directly related to the current permit application

A condition of permit PAS2D701BALL for the co-located Sedat #3A commercial disposal injection well is "the permittee shall not allow the underground injection activity, otherwise authorized by this permit, to cause or contribute to the movement of fluid containing any contaminant into any underground source() of drinking water ("USDW"), if the presence of that contaminant may cause a violation of any primary drinking water regulation under 40 C.F.R. Part 141 or if it may otherwise adversely affect the health of persons." During the last known file review of the Sedat #3A injection well conducted by the Pennsylvania Department of Environmental Protection (DEP) on July 22, 2021, it was found that the "Well operator failed to notify the Department within 24 hours of receiving notification from a landowner, water purveyor, or affected person that a water supply has been affected by pollution or diminution." Since that file review, there have been no subsequent file reviews or inspections at this site. DEP is clearly not equipped to adequately monitor the conditions of disposal injection well, which surely require more than a yearly inspection. The related Sedat 1A monitoring well has not been inspected since November 11, 2020 which will be discussed later in this comment.

Additionally, immediately after receiving a disposal injection well permit from EPA and DEP, DEP issued five violations to Penneco Environmental Solution for poor construction practice at the

Sedat #3A well on August 12, 2020 that could easily contribute to the failure of the well to contain contaminants.

Both sets of violations can be found here:

http://www.ahs.dep.pa.gov/eFACTSWeb/searchResults_singleViolation.aspx?InspectionID=3224342

https://www.ahs.dep.pa.gov/eFACTSWeb/searchResults_singleViolation.aspx?InspectionID=3067473

Given these violations, Penneco Environmental Solutions has not met the conditions of its existing disposal injection well permit for Sedat #3A and should therefore not be granted an additional permit for another disposal injection well permit at the same location, designated as Sedat #4A.

Additionally, the proposed disposal injection well permit for Sedat #4A reads, "The Permittee shall also monitor and record, quarterly, the fluid level from the Penneco Environmental Solutions Sedat #2A well (API #37-003-21222) located in the ¼ mile radius Area of Review used to determine where corrective action, if any, must occur to prevent contamination of USDW from this Injection Well, and which shall serve as a monitoring well for this Injection Well. The Permittee shall compile this monitoring data and include it in the Annual Report referenced in Paragraph II.D.9. of this Permit." However, DEP has not yet inspected the Sedat #2A well after recently granting the transfer of use permit for the Sedat #2A well. It is premature for the EPA to permit the Sedat #4A well before Sedat #2A is inspected.

The inspection frequency of the Sedat #2A well can be seen here:

https://www.ahs.dep.pa.gov/eFACTSWeb/searchResults_singleSite.aspx?SiteID=5992

In the injection disposal well permit for Sedat #3A, Sedat #1A was identified as a necessary monitoring well to ensure that Sedat #3A was properly functioning, but this well has not been inspected since November 13, 2020, which was the well's first inspection since it was plugged in May of 2020 after being granted a transfer of use permit.

The inspection history of monitoring well Sedat #1A can be viewed here

https://www.ahs.dep.pa.gov/eFACTSWeb/searchResults_singleSite.aspx?SiteID=5980

Given the previously mentioned violations and DEP's sporadic and infrequent inspection schedule, DEP clearly does not have the resources to ensure that Penneco's injection disposal wells and monitoring well at this site are properly functioning. I urge the EPA to deny this permit application.

Sincerely,